

Sky Willard

From: Sky Willard
Sent: Tuesday, October 22, 2024 9:38 AM
To: Jason DeSouza; Jorge Alvarez; Sara Gonzalez; Jeffery Pratt
Cc: RAÚL SEDILLO; Marina Pavlakos; Jessica Price; Brianna Somohano; Chandice Saavedra
Subject: RE: Leon-Herrera v. RVJ Transport, et al. - Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Discovery to Plaintiff

Counsel,

Please allow this email to serve as Defendant Jorge Zuniga Isais d/b/a RVJ Transport's ("Defendant") good-faith correspondence to resolve discovery disputes absent Court intervention.

Plaintiff's discovery responses were due yesterday. Plaintiff did not ask for an extension, nor did Plaintiff file a motion with the Court. Accordingly, Plaintiff has waived any potential objections. *See* Fed.R.Civ.P. 33(b)(4) "[t]he grounds for objecting to an interrogatory must be stated with specificity. Any ground not stated in a timely objection is waived..." The same standard applies to requests for production under Fed.R.Civ.P. 34. *See Pulsecard, Inc. v. Discover Card Servs., Inc.*, 168 F.R.D. 295, 303 (D.Kan.1996). Moreover, Defendant's Requests for Admission are now deemed admitted. Fed.R.Civ.P. 36 "A matter is admitted unless, within 30 days after being served, the party to whom the request is directed serves on the requesting party a written answer or objection addressed to the matter and signed by the party or its attorney."

Please provide complete unobjected answers and responses to Defendant's Interrogatories and Requests for Production by October 31, 2024. Additionally, please provide unobjected admissions to all of Defendant's Requests for Admissions by the same date.

Thank you,



SKY WILLARD | Attorney
 Jones, Skelton & Hochuli, P.L.C.
 8220 San Pedro Dr NE, Suite 420 | Albuquerque, NM 87113
 P (505) 339-3511 | F (505) 339-3208

[website](#) | [bio](#) | [vCard](#) | [map](#) | [email](#) | [linkedin](#) | [facebook](#) | [twitter](#)

From: Chandice Saavedra <CSaavedra@JSHFIRM.COM>
Sent: Friday, September 20, 2024 1:05 PM
To: Jason DeSouza <jason@jfdlawfirm.com>; Jorge Alvarez <jorge@jfdlawfirm.com>
Cc: Sky Willard <SWillard@JSHFIRM.COM>; RAÚL SEDILLO <RSedillo@JSHFIRM.COM>; Marina Pavlakos <MPavlakos@JSHFIRM.COM>; Jessica Price <jprice@jfdlawfirm.com>; Brianna Somohano <brianna@jfdlawfirm.com>
Subject: Leon-Herrera v. RVJ Transport, et al. - Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Discovery to Plaintiff

Good afternoon, Counsel:

Attached please find in the above-referenced matter, the following documents in both .pdf and Word format:

1. Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Interrogatories to Plaintiff Juan Carlos Leon-Herrera;

2. Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Requests for Production to Plaintiff Juan Carlos Leon-Herrera; including cell phone, employment, and Social Security Earnings releases, as mentioned therein;
3. Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Requests for Admission to Plaintiff Juan Carlos Leon-Herrera;
4. Certificate of Service (Doc. 34) for same, which was filed with the Court this afternoon.

Should you have any questions or concerns, please do not hesitate to reach out to our office.

Thank you!



CHANDICE L. SAAVEDRA | Paralegal

Jones, Skelton & Hochuli, P.L.C.

8220 San Pedro Dr NE, Suite 420 | Albuquerque, NM 87113

P (505) 339-3505 | F (505) 339-3205

[website](#) | [vCard](#) | [map](#) | [email](#) | [linkedin](#) | [facebook](#) | [twitter](#)